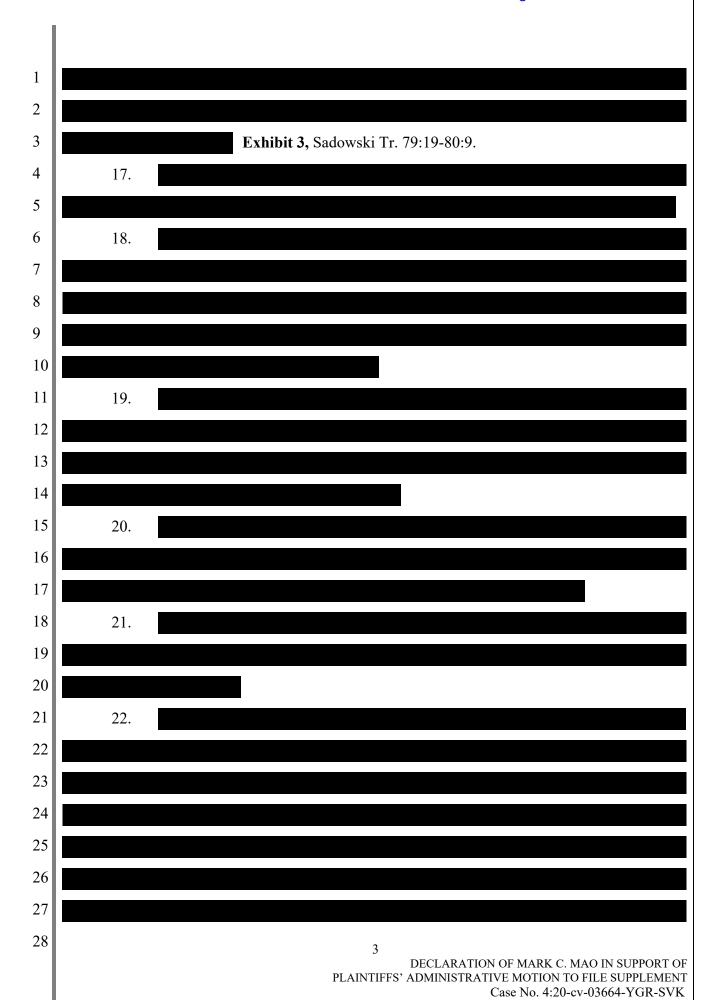
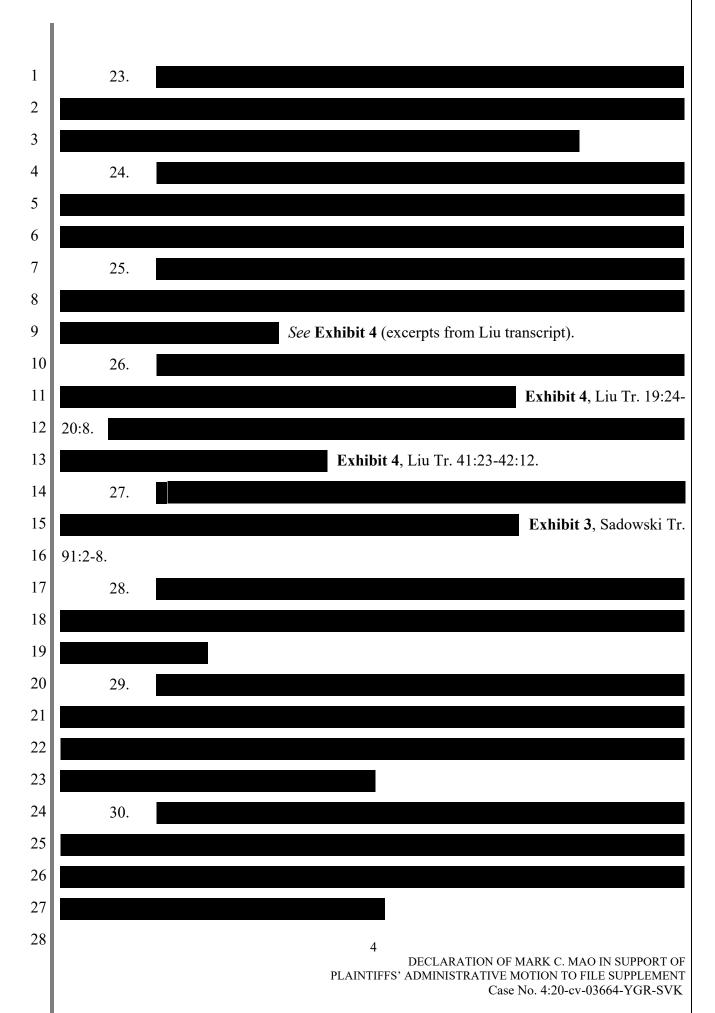
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19	UNITED STATES I	DISTRICT COURT
20	NORTHERN DISTRIC	
21	CHASOM BROWN, WILLIAM BYATT,	Case No.: 4:20-cv-03664-YGR-SVK
22	JEREMY DAVIS, CHRISTOPHER	
22	CASTILLO, and MONIQUE TRUJILLO	DECLARATION OF MARK C. MAO IN
23	individually and on behalf of all similarly	SUPPORT OF PLAINTIFFS'
	situated,	ADMINISTRATIVE MOTION TO FILE
24	D1 : .:00	SUPPLEMENT IN SUPPORT OF THEIR
25	Plaintiffs,	REQUEST FOR ORDER REQUIRING
23	***	GOOGLE TO SHOW CAUSE
26	VS.	The Honorable Susan van Keulen
27	GOOGLE LLC,	Courtroom 6 - 4th Floor
27	GOOGLE LLC,	Date: April 21, 2022
28	Defendant.	Time: 10:00 a.m.
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1 **DECLARATION OF MARK C. MAO** 2 I, Mark C. Mao, declare as follows. 3 I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs 1. 4 in this matter. I am an attorney at law duly licensed to practice before all courts of the State of 5 California. I have personal knowledge of the matters set forth herein and am competent to testify. 6 2. I submit this Declaration in support of Plaintiffs' Administrative Motion to File 7 Supplement in Support of Their Motion for Order Requiring Google to Show Cause Why It Should 8 Not Be Sanctioned for Discovery Misconduct. (Dkt. 430). 9 3. On February 26, 2022, Plaintiffs filed their Motion for an Order to Show Cause 10 Why Google Should Not Be Sanctioned (Dkt. 430, the "Sanctions Motion"). 11 4. Since filing the Sanctions Motion, Plaintiffs have uncovered additional evidence of 12 Google withholding relevant discovery 13 14 5. While Plaintiffs' Sanctions Motion focused on Google's concealment of a 15 Plaintiffs have 16 since discovered that Google also concealed 17 18 19 6. 20 21 22 23 24 25 A true and correct copy of this document is attached hereto as **Exhibit 1**. 26 7. 27 28

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3	8. Pursuant to the Court's November 12, 2021 Order on discovery (Dkt. 331), Goog	le
4	was required to identify all relevant log sources that could contain Plaintiffs' data and information	n.
5	Google then provided a declaration from Andre Golueke (a Discovery Manager in Google's Leg	al
6	Department) confirming that Google had identified all relevant data sources, listed in Exhibit A	to
7	that declaration (Dkt. 338).	
8	9. Following the filing of the Sanctions Motions, Plaintiffs continued meeting ar	ıd
9	conferring with Google, both with and without the supervision of the Special Master. During thos	se
10	meet and confer discussions,	
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12	10.	
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18	12. On March 10, 2022, Plaintiffs deposed Dr. Sadowski.	
19	13. During her testimony, Dr. Sadowski which was marked a	as
20	Exhibit 2 for that deposition. A true and correct copy of that document is attached hereto a	as
21	Exhibit 2.	
22	14.	
23	Se	ге
24	Exhibit 2.	
25	15.	
26		
27	16.	
28	2	





1	31. Attached hereto as Exhibit 1 is a true and correct copy of a document Google
2	produced in discovery labeled GOOG-BRWN-00536949. The document was produced on
3	October 5, 2021.
4	32. Attached hereto as Exhibit 2 is a true and correct copy of a document Google
5	produced during the deposition of Dr. Caitlin Sadowski, marked as Exhibit 2 to that deposition.
6	33. Attached hereto as Exhibit 3 are excerpts from the transcript of the deposition of
7	Dr. Caitlin Sadowski conducted on March 10, 2022.
8	34. Attached hereto as Exhibit 4 are excerpts from the transcript of the deposition of
9	Ms. Mandy Liu conducted on March 8, 2022.
10	I declare under penalty of perjury under the laws of the United States of America that the
11	foregoing is true and correct. Executed this 21st day of March, 2022, at San Francisco, California.
12	/s/ Mark C. Mao
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